Headquarters U.S. Air Force

Integrity - Service - Excellence

Western REO
Air Managers Roundtable

Motor Vehicle Inspection and Maintenance Programs

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I/M Programs—Background

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- 1990 CAA Amendments - States are required to implement I/M programs in certain nonattainment areas per CAA §182
- Federal facility requirements
  - §118(c) - GOV requirement
  - §118(d) - POV requirement
- Federal Interagency Workgroup
- EPA to come out with rulemaking in Federal Register at some point

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I/M Programs—Guidance Document

- Assists federal facilities in meeting I/M program requirements
- Addresses federal facility concerns/issues with I/M programs
- Addresses both government-owned and personally-owned vehicle compliance
- Addresses sensitive-mission vehicle compliance
- Identifies applicable I/M areas nationwide
- Available on Web at http://www.epa.gov/oms/epg/fedfac.htm (EPA420-D-99-003)

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I/M Programs—GOVs

- Fleet vehicles (owned/leased) must be inspected in accordance with the requirements of the local I/M program.
- Military tactical vehicles are exempt.
- GSA-leased vehicles - Using agency (installation) is responsible for having them inspected. GSA must inform installation which vehicles need to be inspected.

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I/M Programs—GOVs

- Govt-leased (other than GSA) vehicles - Terms of lease determine which agency is responsible for meeting I/M requirements.
- Federal facilities can operate their own GOV inspection station, but must comply with same standards set for privately-owned inspection stations.
- Repair cost waivers apply if warranted.

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I/M Programs—GOVs

- Compliance reporting applies if state GOV program is a §118(c) program. If state program is §118(a), then reporting applies if specified in state's regulations.
- Enforcement - States have enforcement authority if program is a §118(a) program; not if a §118(c) program.

I/M Programs—Status of State Programs

State	Fleet Vehicles	Employee Vehicles
Alaska	118(a)	118(a)
Arizona	118(c)	118(d)
California	118(a)	118(d)
Colorado	118(a)	118(a)
Connecticut	118(c)	118(d)
Delaware	118(c)	118(d)
Florida	118(a)	118(d)
Georgia	118(a)	118(d)
Illinois	118(c)	118(d)
Indiana	118(c)	118(d)

I/M Programs—Status of State Programs

State	Fleet Vehicles	Employee Vehicles
Kentucky (L'ville)	118(a)	118(a)
Kentucky (Northern)	118(a)	118(d)
Louisiana	118(c)	118(d)
Maine	118(c)	118(d)
Maryland	118(c)	118(d)
Massachusetts	118(c)	118(d)
Missouri	118(c)	118(d)
Nevada	118(a)	118(d)
New Hampshire	118(c)	118(d)
New Jersey	118(c)	118(d)

I/M Programs—Status of State Programs

State	Fleet Vehicles	Employee Vehicles
New Mexico	118(a)	118(d)
New York	118(a)	118(d)
North Carolina	118(a)	118(d)
Ohio	118(c)	118(d)
Oregon	118(a)	118(d)
Pennsylvania	118(c)	118(d)
Rhode Island	118(a)	118(d)
Tennessee	118(a)	118(d)
Texas	118(c)	118(d)
Utah	118(a)	118(a)

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I/M Programs—Status of State Programs

State	Fleet Vehicles	Employee Vehicles
Vermont	118(c)	118(d)
Virginia	118(a)	118(d)
Washington	118(a)	118(d)
Washington D.C.	118(a)	118(d)
Wisconsin	118(a)	118(d)

I/M Programs—POVs

- POV requirements only apply when a federal facility has custody and control over parking lots used by employees.
- Retirees are not considered employees; the POV requirements only apply to employees.
- Federal facilities must require all employees who park on facility property at least 60 days per calendar year to comply with the local I/M program, regardless of whether the vehicle is registered in another state or outside the program area.

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I/M Programs—POVs

- Facilities with ten or fewer employees have the option to comply or not with I/M programs.
- Employees on temporary assignment or duty are exempt.
- Multi-tenant facility with restricted-access parking vs. non-restricted access parking
- Federal facilities must notify employees about the requirement for them to comply with I/M program.

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I/M Programs—POVs

- Employees must provide proof of compliance with the local I/M program.
- Privacy Act requirements
- Federal facilities must employ enforcement mechanisms designed to ensure compliance.
- Federal facilities must submit annual compliance reports.

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I/M Programs—POVs

- Non-compliant vehicles - Facility must include statement describing how such vehicles will be addressed.
- Fees - Federal facilities shall not collect any applicable administrative fees for submittal to the state.

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I/M Programs—Future?

- EPA to publish rule for federal facility compliance with I/M programs. Spring or summer 02?
- Some states to make changes to their I/M programs to make them CAA §118(a) programs
- Many areas newly designated nonattainment for the new ozone standard will have to deal with I/M.
- After final rule published, affected federal facilities will need to develop and implement compliance plans, if haven't already done so.

I/M Programs—Conclusion

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- GOVs should be complying now with local I/M program requirements. Installations should wait for final rule for POV compliance.
- Facilities with existing I/M programs already in place are not required to modify their compliance programs.
- Installations should be aware that changes to I/M program implementation are coming.